

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re:

Dennis Kovalsky,

Debtor.

Chapter 7

Case No. 16-12928

Hon. Deborah L. Thorne

PHILLIP D. LEVEY, not
individually, but solely as Trustee of
the Chapter 7 Bankruptcy Estate of
Dennis A. Kovalsky,

Plaintiff,

v.

LINDA M. KOVALSKY,

Defendant.

Adv. P. 18-00062

NOTICE OF MOTION

Please take notice that on **Thursday, November 19, 2020, at 9:00 A.M.**, or as soon thereafter as counsel may be heard, the undersigned attorneys shall appear before the Honorable Deborah L. Thorne United States Bankruptcy Judge for the Northern District of Illinois, or any other judge sitting in her place and stead, and shall then and there present the **Motion to Extend Time to File a Supplement to the Motion in Limine**, a copy of which is attached hereto and herewith served upon you.

This motion will be presented and heard electronically using Zoom for Government. No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

To appear by video, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-

646-828-7666. Then enter the meeting ID and password.

Meeting ID and password. The meeting ID for this hearing is 160 9362 1728 and there is no password. The meeting ID can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

Date: November 12, 2020

Respectfully submitted,

Phillip D. Levey, not individually but as
Chapter 7 trustee of the bankruptcy estate of
Dennis Kovalsky,

By: /s/ William J. Factor
One of his attorneys

William J. Factor (6205675)
Jeffrey K. Paulsen
FACTORLAW
105 W. Madison Street, Suite 1500
Chicago, IL 60602
Tel: (312) 878-4830
Fax: (847) 574-8233
Email: wfactor@wfactorlaw.com

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on November 12, 2020, he caused a copy of the attached Motion and Notice of Motion to be served upon the following persons via the CM/ECF System and U.S. Mail.

/s/ William J. Factor

William J. Factor wfactor@wfactorlaw.com; wfactorlaw@gmail.com;
bharlow@wfactorlaw.com; wfactor@ecf.inforuptcy.com;
wfactormyecfmail@gmail.com;
factorwr73923@notify.bestcase.com

Shanna M. Kaminski smkaminski@varnumlaw.com

Karen Newbury knewbury@fgllp.com; mmatlock@fgllp.com;
csmith@gmail.com; csucic@fgllp.com

Jeffrey K. Paulsen jpaulsen@wfactorlaw.com; bharlow@wfactorlaw.com;
jpaulsen@ecf.inforuptcy.com

VIA US MAIL

Linda Kovalsky
1444 Fairfax
Birmingham, MI 48009

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**PLAINTIFF'S MOTION TO EXTEND TIME TO FILE THE SUPPLEMENT
TO THE MOTION IN LIMINE**

Phillip D. Levey, not individually, but solely as chapter 7 trustee for the captioned bankruptcy estate ("Plaintiff"), requests the entry of an order granting him an additional 18 days to, if needed, to file the supplement to the Motion in Limine.

1. Plaintiff filed the Motion in Limine on July 9, 2020 (the "Motion").
2. On October 29, 2020 the Court entered an order providing the Plaintiff until November 12, 2020, to file a supplement to the Motion. *See Dkt. No. 132.*

3. Due to work scheduling, the Plaintiff needs additional time to file a supplement to the Motion.

4. The Plaintiff requests an additional 18 days, until November 30, 2020, to file a supplement to the Motion.

5. This extension will not delay the other deadlines set in the briefing schedule order [Dkt. No. 132].

WHEREFORE, Phillip D. Levey respectfully requests that the Court enter an Order substantially in the form of that appended hereto granting him an additional 18 days to, if needed, file the supplement to the Motion in Limine.

Respectfully submitted,

Phillip D. Levey, not individually but as
Chapter 7 trustee of the bankruptcy estate of
Dennis Kovalsky,

By: /s/ William J. Factor
One of his attorneys

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Jeffrey K. Paulsen
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Chicago, IL 60602
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